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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
EDGAR SANCHEZ,

Plaintiff,

- against -

EZ PARKING CORPORATION,
EK PREMIER SERVICES LLC, and
YAN MOSHE, individually,

Plaintiffs.

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FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

Plaintiff requests that Defendant EK Premier Services LLC (“EK Premier”) produce to Plaintiff’s counsel the following documents no later than thirty days after service of these Document Requests, or at such other time as the parties may agree.

INSTRUCTIONS

1. The following requests for production of documents shall be continuing to the fullest extent permitted by law. Accordingly, if, subsequent to serving responses to or producing documents in response to any document request, EK Premier, or any other person on EK Premier’s behalf, obtains or becomes aware of additional information or documents pertaining to such document request, EK Premier is required to provide supplemental responses or produce

supplemental documents which will augment or otherwise modify the previous responses. Such supplemental documents and responses are to be served upon Plaintiff within thirty days after EK Premier receives or becomes aware of such information or documents, but no later than one week prior to the date of trial in this action.

2. If any document is withheld on grounds of privilege, EK Premier must provide the following information:

- (a) the date, the name, business affiliation and job title of the sender and author (if different from the sender) and all recipients;
 - (b) the name, business affiliation and job title of every person to have seen or been told of the contents of such document;
 - (c) a brief description of the nature and the subject matter of the document;
- and
- (d) the basis on which the privilege is claimed.

3. If EK Premier has possession, custody or control of the originals of the documents requested, then the originals and all non-identical copies should be produced; if EK Premier does not have possession, custody or control of the originals, then an identical copy of the original and all non-identical copies of each original should be produced.

4. These requests for production of documents should be read, interpreted, and responded to in accordance with the definitions, instructions and detail required by the Federal Rules of Civil Procedure.

5. The relevant period for these requests is June 1, 2017 to the present.

DOCUMENTS REQUESTED

1. Documents sufficient to reflect the annual revenues, for each year 2017-2023, inclusive, of EK Premier.
2. All pay records concerning Plaintiff.
3. All documents reflecting hours worked by Plaintiff.
4. All documents which support any of EK Premier's affirmative defenses.
5. All documents reflecting any agreement between either Dr. Regina Moshe or Yan Moshe, on the one hand, and EK Premier concerning the parking of any cars.
6. All documents reflecting any supervisory authority of Plaintiff relating to his employment with EK Premier.
7. All documents concerning the incorporation of EK Premier, including but not limited to bylaws, articles of incorporation, and/or share certificates.
8. All document concerning any transaction between EK Premier and any other individual or entity concerning the assumption by EK Premier of the operation of the parking garage located at 63-36 99th Street, Rego Park, NY, 11374-1979.
9. All documents reflecting any communications between any representative of EK Premier and any representative of EZ Parking Corporation.
10. All agreements between EK Premier and any other individual or entity concerning the parking garage located at 63-36 99th Street, Rego Park, NY, 11374-1979.

Dated: January 5, 2024

LAW OFFICES OF VINCENT E. BAUER

s/_____
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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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EDGAR SANCHEZ,

Plaintiff,

- against -

EZ PARKING CORPORATION,
EK PREMIER SERVICES LLC, and
YAN MOSHE, individually,

Plaintiffs.
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SECOND REQUEST FOR PRODUCTION OF DOCUMENTS

Plaintiff requests that Defendant EK Premier Services LLC ("EK Premier") produce to Plaintiff's counsel the following documents no later than thirty days after service of these Document Requests, or at such other time as the parties may agree.

INSTRUCTIONS

1. The following requests for production of documents shall be continuing to the fullest extent permitted by law. Accordingly, if, subsequent to serving responses to or producing documents in response to any document request, EK Premier, or any other person on EK Premier's behalf, obtains or becomes aware of additional information or documents pertaining to such document request, EK Premier is required to provide supplemental responses or produce

supplemental documents which will augment or otherwise modify the previous responses. Such supplemental documents and responses are to be served upon Plaintiff within thirty days after EK Premier receives or becomes aware of such information or documents, but no later than one week prior to the date of trial in this action.

2. If any document is withheld on grounds of privilege, EK Premier must provide the following information:

- (a) the date, the name, business affiliation and job title of the sender and author (if different from the sender) and all recipients;
 - (b) the name, business affiliation and job title of every person to have seen or been told of the contents of such document;
 - (c) a brief description of the nature and the subject matter of the document;
- and
- (d) the basis on which the privilege is claimed.

3. If EK Premier has possession, custody or control of the originals of the documents requested, then the originals and all non-identical copies should be produced; if EK Premier does not have possession, custody or control of the originals, then an identical copy of the original and all non-identical copies of each original should be produced.

4. These requests for production of documents should be read, interpreted, and responded to in accordance with the definitions, instructions and detail required by the Federal Rules of Civil Procedure.

5. The relevant period for these requests is June 1, 2017 to the present.

DOCUMENTS REQUESTED

1. All documents reflecting revenues generated by EK Premier in connection with the operation of the subject parking garage, for each year 2017-2023, inclusive.

Dated: May 21, 2024

LAW OFFICES OF VINCENT E. BAUER

s/_____
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